

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT COURT OF TEXAS
HOUSTON DIVISION

Zhejiang Medicine Co., Ltd.,
and
ZMC-USA L.L.C.

Plaintiffs,
v.
Kaneka Corporation
Defendant.

CIVIL ACTION No. 4:11-CV-1052 (VDG)

And Related Counterclaims

MOTION FOR SUBSTITUTION OF COUNSEL

TO THE HONORABLE JUDGE OF SAID COURT:

Now comes Defendant/Counter-Plaintiff Kaneka Corporation (hereinafter "Kaneka" or "Defendant"), and files this Motion for Substitution of Counsel. Kaneka would respectfully show the Court the following:

Kaneka's current counsel of record (hereinafter "Defendant's Original Counsel"), are Dariush G. Adli, Rasheed McWilliams, Tawen Chang, and David Tseng of ADLI Law Group, P.C.

Kaneka's current local counsel of record (hereinafter "Defendant's Local Counsel"), are John W. Raley and Robert M. Bowick of Raley & Bowick, LLP.

Kaneka has engaged Keith Nowak and William Sondericker of the firm Carter Ledyard & Milburn LLP, 2 Wall Street, New York, NY 10005, Phone: (212) 238-8610, Fax: (212) 732-3232 (hereinafter "Defendant's Substitute Counsel"), to represent them in this pending action.

This substitution is requested jointly, and approved by both Defendant's Original Counsel and Defendant's Substitute Counsel, as evidenced by their signatures below. This substitution is not sought for delay.

Further, Defendant's Local Counsel will continue their representation of defendant in this matter.

WHEREFORE, Kaneka Corporation respectfully requests entry of an Order substituting Keith Nowak and William Sondericker of the firm Carter Ledyard & Milburn LLP as counsel of record; discharging Dariush G. Adli, Rasheed McWilliams, Tawen Chang, and David Tseng and the law firm ADLI Law Group, P.C.; and for such other and further relief, both general and special, to which defendant may be justly entitled.

Date: June 26, 2012

Respectfully submitted,

/s/ Keith Nowak*

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**ATTORNEYS FOR DEFENDANT/
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*Signed by Permission

CERTIFICATE OF SERVICE

This is to certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5.3 on June 26, 2012. Any other counsel of record will be served via facsimile transmission and first class certified mail, return receipt requested.

/s/ Robert M. Bowick

Robert M. Bowick